

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

ALEXANDRA LOZANO IMMIGRATION
LAW, PLLC,

Plaintiff,

v.

JUAN PABLO DIAZ CUENCA and
MENESES LAW, PLLC

Defendants.

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Civil Action No. 4:24-cv-02190

AGREED MOTION FOR EXPEDITED DISCOVERY ORDER AND BRIEFING SCHEDULE

Defendant Meneses Law PLLC (Meneses Law”), Plaintiff Alexandra Lozano Immigration Law, PLLC (“ALIL” or “Plaintiff”), and Defendant Juan Pablo Diaz Cuenca (“Diaz”), (together the “Parties”) submit the following agreed motion for entry of an expedited discovery order and briefing schedule and would show the Court as follows:

I. INTRODUCTION

Alexandra Lozano Immigration Law PLLC filed its motion for preliminary injunction on July 26, 2024. *See* Dkt. 20. ALIL and Defendants Juan Pablo Diaz Cuenca and Meneses Law agree that discovery will be needed to prosecute ALILs’ preliminary injunction and to defend against it. Accordingly, there is good cause for an expedited discovery order in this case.

II. PROPOSED DISCOVERY AND BRIEFING SCHEDULE

The Parties jointly propose the following schedule as a reasonable expedited discovery schedule that will allow the Parties sufficient time to conduct discovery necessary for the preliminary injunction proceedings.

August 2nd

DISCOVERY REQUESTS. Parties may serve written discovery requests. Requests for production are limited to 10 per Party. Interrogatories are limited to 5 per Party.

August 16th

DISCOVERY RESPONSES. Parties to serve responses and objections to all discovery requests and produce responsive documents.

September 2nd

EXPERT DISCLOSURES. Expert disclosures related to the preliminary injunction motion shall be made in compliance with Federal Rule of Civil Procedure 26(a)(2).

September 13th

DEPOSITIONS. All depositions must be completed. Depositions of lay witnesses are limited to 10 hours in total per side. Depositions of experts shall be limited to 2.5 hours per expert.

September 23rd

DEFENDANTS' RESPONSE TO MOTION FOR PRELIMINARY INJUNCTION DUE. Meneses Law and Diaz must file their response to Plaintiff's preliminary injunction motion.

October 4, 2024

PLAINTIFF'S REPLY IN SUPPORT OF MOTION FOR PRELIMINARY INJUNCTION DUE. Plaintiff must file its reply in support of Plaintiff's preliminary injunction motion.

Dated: August 2, 2024

Respectfully submitted,

AHMAD, ZAVITSANOS & MENSING, PLLC

/s/ Jason S. McManis

Joseph Y. Ahmad

State Bar No. 00941100

Federal ID: 11604

Jason S. McManis

State Bar No. 24088032

Federal ID: 3138185

Michael Killingsworth

State Bar No. 24110089

Federal ID: 3372610

joeahmad@azalaw.com

jmcmanis@azalaw.com

mkillingsworth@azalaw.com

1221 McKinney, Suite 2500

Houston, Texas 77010

Phone: (713) 655.1101

Fax: (713) 655.0062

**ATTORNEYS FOR DEFENDANT MENESES
LAW FIRM PLLC**

Agreed as to form and substance:

/s/ Nathaniel J. Higgins

Lauren Hope Whiting

Texas Bar No. 24084091

JACKSON LEWIS P.C.

93 Red River St., Ste. 1150

Austin, Texas 78701

512.362.7408 [Telephone]

512.362.5574 [Facsimile]

Lauren.Whiting@jacksonlewis.com

Pamela B. Linberg

Texas Bar No. 00793299

S.D. TX Bar No. 23981

Nathaniel J. Higgins

Texas Bar No. 24087720

S.D. TX Bar No. 3277285

JACKSON LEWIS P.C.

717 Texas Avenue, Suite 1700

Houston, TX 77002
713.650.0404 [Telephone]
713.650.0405 [Facsimile]
Pamela.Linberg@jacksonlewis.com
Nathaniel.Higgins@jacksonlewis.com

Kirsten R. Fraser (*Pro Hac Vice*)
ORGAN LAW LLP
1330 Dublin Road
Columbus, Ohio 43215
614.481.0900 [Telephone]
614.481.0904 [Facsimile]
kfraser@organlegal.com

**ATTORNEYS FOR PLAINTIFF , ALEXANDRA
LOZANO IMMIGRATION LAW, PLLC**

/s/ Ashish Mahendru
Ashish Mahendru
Texas Bar No.
S.D. TX Bar No.
Mahendru, PC
639 Heights Blvd.
Houston, Texas 77007
amahendru@thelitigationgroup.com

**ATTORNEY FOR DEFENDANT,
JUAN PABLO DIAZ CUENCA**

CERTIFICATE OF CONFERENCE

I hereby certify that, between July 30 and August 2, 2024, counsel conferred via video conference and email regarding expedited discovery related to Plaintiffs application for a preliminary injunction. All parties agree to the schedule and discovery limits set forth herein.

CERTIFICATE OF SERVICE

I hereby certify that on August 2, 2024 a true and correct copy of the foregoing was duly served by email on all counsel of record.

/s/ Jason S. McManis
Jason S. McManis